| 1 | JOSHUA E. KIRSCH (SBN: 179110) jkirsch@gibsonrobb.com | |
|----|---|---|
| 2 | GIBSON ROBB & LINDH LLP 1225 Powell Street | |
| 3 | Emeryville, CA 94608 Tel: (415) 348-6000 | |
| 4 | Fax: (415) 231-0037 | |
| 5 | Attorneys for Plaintiff SUN FRESH INTERNATIONAL, LLC | |
| 6 | SONTRESH INTERNATIONAL, ELC | |
| 7 | ANDREW I. PORT (SBN: 120977) aport@grsm.com | |
| 8 | LEA M. LUTERSTEIN (SBN: 337399) lluterstein@grsm.com | |
| 9 | GORDON REES SCULLY MANSUKHANI, I 315 Pacific Avenue | LLP |
| 10 | San Francisco, CA 94111 Tel: (415) 986-5900 | |
| 11 | Fax: (415) 986-8054 | |
| 12 | Attorneys for Defendant SWIRE SHIPPING PTE. LTD., erroneously su | ed herein as SWIRE SHIPPING |
| 13 | SWIRE SITH THROTTE. ETD., Choicousty su | ed herein as 5 whele still i hvo |
| 14 | UNITED STATES DISTRICT COURT | |
| 15 | EASTERN DISTRI | CT OF CALIFORNIA |
| 16 | | |
| 17 | SUN FRESH INTERNATIONAL, LLC, a limited liability company, | Case No. 1:24-cv-00680-KES-BAM |
| 18 | Plaintiff, | STIPULATION REGARDING EXTENSION OF TIME FOR |
| 19 | V. | DEFENDANT SWIRE SHIPPING PTE. LTD. TO RESPOND TO PLAINTIFF'S |
| 20 | UWL, INC., a corporation; and SWIRE | COMPLAINT |
| 21 | SHIPPING, an entity of unknown form, | |
| 22 | Defendants. | |
| 23 | | |
| 24 | Defendant SWIRE SHIPPING PTE. LT | D., erroneously sued herein as SWIRE |
| 25 | SHIPPING, ("Swire") and Plaintiff SUN FRESH INTERNATIONAL, LLC, by and through | |
| 26 | their respective counsel, hereby stipulate that Swire may have an extension of time up to and | |
| 27 | including August 15, 2024 within which to answer, move, or otherwise respond to Plaintiff's | |
| 28 | Complaint in the above-referenced matter. This | s is Swire's first extension of time to respond to |

Case No. 1:24-cv-00680-KES-BAM

Case 1:24-cv-00680-KES-BAM Document 15 Filed 08/12/24 Page 2 of 4

| 1 | the Complaint. Good cause exists for this stipulated extension of time as attorneys for Swire | |
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| 2 | were only made aware of Plaintiff's service of the Complaint on July 30, 2024 and | |
| 3 | immediately conferred with Plaintiff's counsel to obtain an extension the same day, pursuant | |
| 4 | to Local Rule 144(d), and because Swire is currently attempting to collect information and/or | |
| 5 | documents from Southeast Asia to assist it in determining the appropriate response to | |
| 6 | Plaintiff's Complaint. | |
| 7 | | |
| 8 | IT IS SO STIPULATED. | |
| 9 | | |
| 10 | DATED: August _7, 2024 GIBSON ROBB & LINDH LLP | |
| 11 | | |
| 12 | By: | |
| 13 | JOSHUA E. KIRSCH Attorneys for Plaintiff | |
| 14 | SUN FRESH INTERNATIONAL, LLC | |
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| 16 | DATED: August _8, 2024 GORDON REES SCULLY MANSUKHANI, LLP | |
| 17 | By: Andrew I. Port | |
| 18 | Attorneys for Defendant SWIRE SHIPPING PTE. LTD., erroneously sued | |
| 19 | herein as SWIRE SHIPPING | |
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Case 1:24-cv-00680-KES-BAM Document 15 Filed 08/12/24 Page 3 of 41 JOSHUA E. KIRSCH (SBN: 179110) jkirsch@gibsonrobb.com GIBSON ROBB & LINDH LLP 1225 Powell Street 3 Emeryville, CA 94608 (415) 348-6000 Tel: 4 Fax: (415) 231-0037 5 Attorneys for Plaintiff SUN FRESH INTERNATIONAL, LLC 6 7 ANDREW I. PORT (SBN: 120977) aport@grsm.com LEA M. LUTERSTEIN (SBN: 337399) lluterstein@grsm.com GORDON REES SCULLY MANSUKHANI, LLP 315 Pacific Avenue 10 San Francisco, CA 94111 (415) 986-5900 Tel: (415) 986-8054 11 Fax: 12 Attorneys for Defendant San Francisco, CA 94111 SWIRE SHIPPING PTE. LTD., erroneously sued herein as SWIRE SHIPPING 13 14 UNITED STATES DISTRICT COURT 15 EASTERN DISTRICT OF CALIFORNIA 16 17 SUN FRESH INTERNATIONAL, LLC, a Case No. 1:24-cv-00680-KES-BAM limited liability company, 18 [PROPOSED] ORDER GRANTING Plaintiff. EXTENSION OF TIME FOR 19 DEFENDANT SWIRE SHIPPING PTE. LTD. TO RESPOND TO PLAINTIFF'S v. **COMPLAINT** 20 UWL, INC., a corporation; and SWIRE 21 SHIPPING, an entity of unknown form, 22 Defendants. 23 24 25 26 27

Gordon Rees Scully Mansukhani, LLP

315 Pacific Avenue

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Case 1:24-cv-00680-KES-BAM Document 15 Filed 08/12/24 Page 4 of 4

| 1 | On August 6, 2024, Defendant SWIRE SHIPPING PTE. LTD., erroneously sued herein |
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| 2 | as SWIRE SHIPPING, ("Swire") and Plaintiff SUN FRESH INTERNATIONAL, LLC, by |
| 3 | and through their respective counsel, filed a stipulation for an extension of time for Swire to |
| 4 | respond to Plaintiff's Complaint. (Doc. 14.) Good cause appearing, the Court hereby |
| 5 | GRANTS the Stipulation. Swire must respond to Plaintiff's Complaint on or before August |
| 6 | 15, 2024. |
| 7 | |
| 8 | IT IS SO ORDERED. |
| 9 | Dated: August 12, 2024 /s/Barbara A. McAuliffe |
| 10 | UNITED STATES MAGISTRATE JUDGE |
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Gordon Rees Scully Mansukhani, LLP 315 Pacific Avenue San Francisco, CA 94111